

EXHIBIT B-4

**UNITED STATES DISTRICT COURT FOR THE
MIDDLE DISTRICT OF PENNSYLVANIA**

AL'S DISCOUNT PLUMBING;
ACCURATE BACKFLOW AND
PLUMBING SERVICES, INC.;
HOMESTEAD HEATING &
PLUMBING, LLC; AIRIC'S
HEATING & AIR CONDITIONING,
INC.; PRIME SOURCE PLUMBING
& HEATING CORP.; RYAN
PLUMBING, INC.; MAZZOLA
PLUMBING HEATING & GAS
FITTING, INC.; SOUTH SHORE
HEATING AND PLUMBING, INC.;
ALL KNIGHT PLUMBING,
HEATING AND AIR
CONDITIONING, INC.; PLUMB
PERFECTION, LLC, individually and
on behalf of all others similarly situated,

Plaintiffs,

v.

VIEGA LLC,

Defendant.

Case No: 19-cv-00159

Honorable Christopher C. Conner

Electronically Filed

**DECLARATION OF NATHAN D. PROSSER IN SUPPORT OF PLAINTIFFS'
UNOPPOSED MOTION FOR FINAL APPROVAL OF SETTLEMENT AND
ATTORNEYS' FEES, EXPENSES AND SERVICE AWARD**

I, Nathan D. Prosser, Esq., hereby declare and state as follows:

1. I am a partner at the law firm of Hellmuth & Johnson PLLC (the "Firm"). I submit this declaration in support of Plaintiffs' Motion for Final Approval of Settlement and Attorneys' Fees, Expenses and Service Award. I have personal knowledge of the information set forth in this Declaration.

2. Over the course of this Action, Counsel have successfully navigated Plaintiff and the Class through a fully briefed motion to dismiss, nearly complete discovery of class representatives, extensive merits discovery, and mediation resulting in settlement.

3. The attorneys from my Firm that have worked on this Action are Nathan D. Prosser, Anne T. Regan, Carol M. Moss, Alexandria M. Mueller, Katherine A. Herman, and Brian W. Nelson. Under the direction of Interim Class Counsel, the Firm undertook the following assignments: Prepare and defend depositions of class representatives, Airic's Heating & Air Conditioning, Inc. and Ryan Plumbing, Inc., assist in onsite collection of documents, collect and review documents in response to discovery requests, extensive review and analysis of Defendant's documents produced in merits discovery for responsiveness, motion practice and drafting and editing discovery responses and document production on behalf of named plaintiffs.

4. Not including the time expended in preparing the application for fees and expenses, the table below details the hours billed and the amount billed at average historical rates for these attorneys along with a collective entry for the Firm's paralegals:¹

<u>Attorney</u>	<u>Hours Billed</u>	<u>Amount</u>	<u>Hourly Rate</u>
Anne T. Regan (P)	6.4	\$4,864	\$760
Nathan D. Prosser (P)	109.2	\$80,808	\$740
Carol M. Moss (P)	33.3	\$18,315	\$550
Brian W. Nelson (A)	1.4	\$602	\$430
Alexandria M. Mueller (A)	223.5	\$67,050	\$300
Katherine Herman (A)	10.0	\$3,000	\$300

This summary was prepared from contemporaneous, daily time records regularly prepared and maintained by my firm.

¹ If the Court wishes, the Firm can provide more detailed time entries describing the work of these attorneys and paralegals, as well as the Firm's expenses.

5. The hourly rates for the attorneys and professional support staff at my firm are the usual and customary hourly rates charged and have been approved by federal and state courts nation-wide.

6. During the course of this Action, the Firm incurred \$218.45 in unreimbursed billable expenses. These expenses were incurred and tracked in the Firm's normal course of business. The chart below details the expenses incurred by category:

CATEGORY	EXPENSE AMOUNT
Copying, Printing and Scanning	\$0
Telephone and Conference Calls	\$0
Messenger and delivery services	\$0
Service of Process	\$0
Carfare, Travel and Meals	\$118.45
Expert Fees	\$0
Court Reporters and Transcripts	\$0
Legal Research and Filing Fees	\$100
Mediators	\$0

I hereby declare under penalty of perjury that above is true and correct to the best of my knowledge.

Executed this 2nd day of November, 2020

/s/ Nathan D. Prosser